

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF:

**THE SEARCH AND SEIZURE
WARRANTS, APPLICATIONS, PEN
REGISTERS, AND NON-DISCLOSURE
ORDERS IN THE CASES LISTED IN
ATTACHMENT A**

CASE No.

MAGISTRATE JUDGE KING

FILED UNDER SEAL

MOTION TO SEAL

Now comes the United States, by its undersigned counsel, Assistant United States Attorney Michael J. Hunter, and hereby respectfully requests, pursuant to FED. R. CRIM. P. 41(f)(3) and 18 U.S.C. § 3103a(a)(3), that the Search and Seizure Warrants, Applications, Pen Registers, and Non-Disclosure Orders and related documents in the cases listed in Attachment A in the above-entitled matter, continue to be sealed until January 31, 2022, or until upon a Motion by the United States and additional Order by the Court to unseal. The undersigned counsel represents that there has been a review of each of the case listed in Attachment A, and that each relates to an extensive, on-going and long-term criminal investigation that would be compromised if the existence of these investigations becomes known. The United States is apprehensive that if the documents in Attachment A were unsealed, pertinent evidence may be destroyed, or additional persons associated with the investigation may attempt to flee the jurisdiction of the court, if targets or persons associated become aware of said Search and Seizure Warrants, Applications, Pen Registers, and Non-Disclosure Orders and related documents in the cases listed in Attachment A.

WHEREFORE, the government respectfully requests that the Search and Seizure Warrants, Applications, Pen Registers, and Non-Disclosure Orders and related documents in the cases listed in Attachment A in the above-entitled cause, continue to be sealed until January 31, 2022, or until upon a Motion by the United States and additional Order by the Court to unseal, which will ensure that the above-mentioned investigations can continue without the targets or persons associated with the investigation becoming aware.

Respectfully submitted,

VIPAL J. PATEL
United States Attorney

s/Michael J. Hunter

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